

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SALLY CANNON, On Behalf of Herself and )  
All Others Similarly Situated )  
Plaintiff, )  
v. ) Civil Action No. 05-00429-GMS  
MBNA CORPORATION, et al. )  
Defendants. )

**STIPULATED ORDER EXTENDING TIME  
AND ESTABLISHING A SCHEDULE**

WHEREAS defendants' response to the complaint in this action is currently due on September 9, 2005,

WHEREAS defendants have agreed voluntarily to provide plaintiff with certain information that plaintiff will consider in determining whether to file an amended complaint in this action;

WHEREAS plaintiff intends to file a motion for (a) appointment of Wolf Haldenstein Adler Freeman & Herz LLP (“Wolf Haldenstein”) as interim counsel on behalf of the putative class, appointment of Rosenthal, Monhait, Gross & Goddess, P.A. as interim liaison counsel, and creation of an executive committee consisting of Wolf Haldenstein, Goodkind Labaton Rudoff & Sucharow LLP, and Gainey & McKenna, and (b) for consolidation of this action with any related ERISA cases that are subsequently-filed or removed or transferred to this Court;

WHEREAS defendants take no position with respect to plaintiff's proposed motion but reserve the right to oppose certification of the putative class;

IT IS HEREBY STIPULATED AND AGREED, by the parties to this action and subject to the Order of this Court, that (i) plaintiff will have 60 days from the date of entry of this Order to serve and file an amended complaint, (ii) defendants will have 60 days thereafter to answer, move to dismiss or otherwise respond to plaintiff's complaint, (iii) in the event that one or more defendants file a motion to dismiss, plaintiff will have 60 days to file its answering brief in response to such motion to dismiss and the moving defendant or defendants will have 45 days to submit their reply.

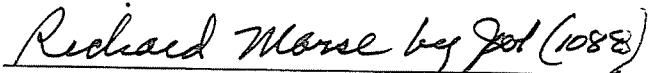
DATED: September 8, 2005

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Attorney for Defendants Randolph D. Lerner, James H. Berick, Benjamin R. Civiletti, William L. Jews, Stuart L. Markowitz, William B. Milstead, and Thomas G. Murdough, Jr.

SO ORDERED, this \_\_\_\_ day of September, 2005.

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United States District Judge